

STATE GOVERNMENT FLEET COMPLIANCE WITH THE ENERGY POLICY ACT OF 1992

SELF-AUDIT PROCEDURES

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U.S. Department of Energy
Office of FreedomCAR and Vehicle Technologies
Alternative Fuel Transportation Program (10 CFR Part 490)
State & Alternative Fuel Provider Program Regulations

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INTRODUCTION

The U.S. Department of Energy (DOE) is responsible for implementing and enforcing the Alternative Fuel Transportation Program, 10 CFR Part 490. This program includes the regulations affecting state government and alternative fuel provider fleets, which were adopted in 1996 pursuant to the Energy Policy Act (EPA) of 1992 (See 42 U.S.C. §§ 13251, 13257). Because of the fleets covered, the Program is sometimes referred to as the State and Alternative Fuel Provider (S&FP) Program. EPA and the regulations found in 10 CFR Part 490 require that a percentage of light duty vehicles acquired each model year by covered state government and alternative fuel provider fleets must be alternative fuel vehicles (AFVs).¹ Covered fleets also are required to submit an annual report to DOE. The annual report documents compliance with the Program's AFV acquisition requirements, providing the number of covered light duty vehicles acquired and specific information on newly acquired AFVs. Annual reports are due by December 31 and cover the previous model year's acquisitions (a model year runs from September 1 to August 31).

Although most states are generally believed to be in compliance with the Program's requirements, some individual state government fleets may be unaware of their coverage under the Program. Some fleets already reporting to DOE also may not fully understand the regulations requirements. In addition, state fleets that were not initially covered may subsequently qualify for coverage if they expand their fleet size or move their fleet's location. In some cases, fleets that downsize or change locations may no longer be subject to the Program's requirements. DOE, therefore, has developed these self-audit procedures to increase compliance. DOE believes that state officials are in the best position to perform fleet audits and that self-audits are the most efficient and least intrusive means of ensuring compliance. While it does not have authority to require states to conduct self-audits, DOE has authority pursuant to EPA to audit state government fleet records.

The procedures recommended in this document are based in part on procedures that were used by Maryland state officials. Maryland's Office of Legislative Audits reported the results of a self-audit in the January 2002 document "Performance Audit Report: Compliance with the Federal Energy Policy Act of 1992 and Use of Alternative Fuel." After close examination of a select group of state government fleets, state officials responsible for the audit determined that there were two primary issues with respect to compliance. First, some state entities did not understand how to report vehicle acquisition data. Errors were made in filling out reporting forms used by the state. Mistakes included improperly identifying some conventionally fueled vehicles as alternatively fueled, entering the wrong number of acquired LDVs, and crediting vehicle acquisitions in the wrong year. Second, some agencies initially did not fully understand guidance that had been issued. In some instances, guidance developed by state officials omitted key criteria included in EPA.

Maryland is the only state that DOE knows has conducted a formal self-review of its fleets for compliance with EPA. DOE's S&FP Program intends to encourage other states to undertake

¹ Covered persons and fleets also may use biodiesel fuel blends and credits to comply with the AFV acquisition requirements.

similar self-audits to increase compliance with EPA's provisions and is providing this document to facilitate compliance reviews and audits.

DOE is committed to working with state government fleets to help them attain compliance. In addition to providing the self-audit guidance, DOE will assist state officials in setting up their audits and answering questions that come up during audits. DOE will work with fleets that are out of compliance to develop compliance strategies.

OVERVIEW OF EPA ACT COVERAGE & REQUIREMENTS

The goals of the EPA Act transportation programs are to reduce U.S. dependence on imported oil, improve the health of the nation's economy, and reduce greenhouse gas emissions. EPA Act focuses on targeted fleets as a way to increase demand for AFVs and alternative fuels. Unlike other regulatory programs that focus on environmental benefits or energy efficiency gains, EPA Act's transportation provisions are primarily intended to replace petroleum consumption through alternative fuel use.

The regulations contained in 10 CFR Part 490 have been interpreted by DOE as pertaining to state entities, including agencies, universities, colleges and departments that are part of the state government. Some state fleets mistakenly believed that the regulations only covered state agencies. Section 501 of EPA Act, however, extends coverage to "State government fleets, including agencies thereof, but not municipal fleets, ..." 42 USC § 13257(o). DOE has taken this language to mean that some state government entities, even if they are not classified as state agencies, are potentially covered by the AFV acquisition provisions. DOE also has interpreted its regulations as covering most publicly-funded university and college systems because they are established by the state, receive state funding, their governance is often prescribed by state law, and many operate large light duty fleets.

SPECIFIC EPA ACT PROVISIONS

- Determining Coverage (10 CFR 490.2 – key definitions): The S&FP Program requirements cover state government "fleets" that meet the following three criteria.

The state government entity controls 50 or more LDVs within the United States that are not excluded vehicles²; at least 20 of those vehicles are operated primarily within an area defined as a Metropolitan Statistical Area (MSA)² or a Consolidated Metropolitan Statistical Area (CMSA)³; and these 20 vehicles are centrally fueled or are capable of being "centrally refueled"⁴ at least 75 percent of the time (see Figure 1).

² Excluded vehicles include emergency, law enforcement, national security, and nonroad vehicles, vehicles that are parked at private residences when not in use, and vehicles used for testing and evaluative purposes.

³ Geographical areas with populations of 250,000 or more as determined by the 1980 census; DOE has published a list of the covered areas that is available on the EPA Act website.

⁴ "Capable of central fueling" means that 75% or more of the vehicle's annual miles are derived from trips that are less than the operational range of the vehicle. Most vehicles (except those that travel on very long trips and only infrequently return to a central location) are considered to be capable of central fueling under DOE's regulations.

- AFV Purchase Requirements (10 CFR 490.201): “Covered” state entities must ensure that a certain percentage of their annual acquisitions of LDVs are AFVs.

The schedule for AFV acquisitions by percent of a state’s new LDV acquisitions is as follows:

- 10% in model year⁵ (MY) 1997;
- 15% in MY 1998;
- 25% in MY 1999;
- 50% in MY 2000; and
- 75% in model year 2001 and thereafter.

Fleets that previously were not covered must come into the program at the 75% acquisition level. The model year runs from September 1 to August 31 (10 CFR 490.201(d)).

- Annual Reports (10 CFR 490.205): Covered state fleets must file an annual report with DOE by December 31.

To be in compliance, the state must provide data showing that it achieved the required percentage of AFV credits relative to total LDV acquisitions. In addition to purchasing AFVs, fleets can satisfy up to 50% of their purchase requirements by purchasing biodiesel for use in blends that contain at least 20% or more biodiesel fuel (e.g., B20). Fleets also have the option of acquiring credits from other fleets or using banked credits for compliance.

- Single Report (10 CFR 490.205): DOE prefers that the state comply with EPAAct as a single entity, counting and reporting the total number of nonexcluded LDVs and AFVs acquired by all its agencies. However, the state may decide to allow individual entities or groups of entities to comply and report on their own. If a state decides to change its method of reporting, it must notify DOE. For states that file a single or consolidated report, all state owned or operated vehicles used in a covered MSA or CMSA are considered part of the same fleet for purposes of reporting and compliance. The annual report submitted by the state therefore should include all state fleet vehicles acquired for use in a covered MSA or CMSA. Newly acquired light duty vehicles do not have to be counted or reported if they are “excluded vehicles.”
- Making up Credit Deficiencies (10 CFR 490.206 – Violations; 10 CFR 490.603 – Prohibited Acts; 10 CFR 490.604 – Penalties and Fines): Fleets that fail to acquire sufficient numbers of AFVs must make up the credit deficiency or face potential enforcement action, which can include the assessment of monetary penalties.

If total credits fall below the percentage requirement, fleets may transfer or purchase excess credits from other sources. The S&FP Program generally allows fleets that earn

⁵ For purposes of these regulations, model year means the period from September 1 of the previous calendar year through August 31. For example, model year 2000 would cover vehicles acquired during September 1, 1999 through August 31, 2000.

credits to bank them or sell them to other fleets. The one exception is that biodiesel fuel credits may not be banked or transferred. A number of state fleets currently have excess credits. Under DOE's regulations, fleets that generate credits with the intention of selling them to fuel provider fleets must be able to document that their AFVs use alternative fuel.

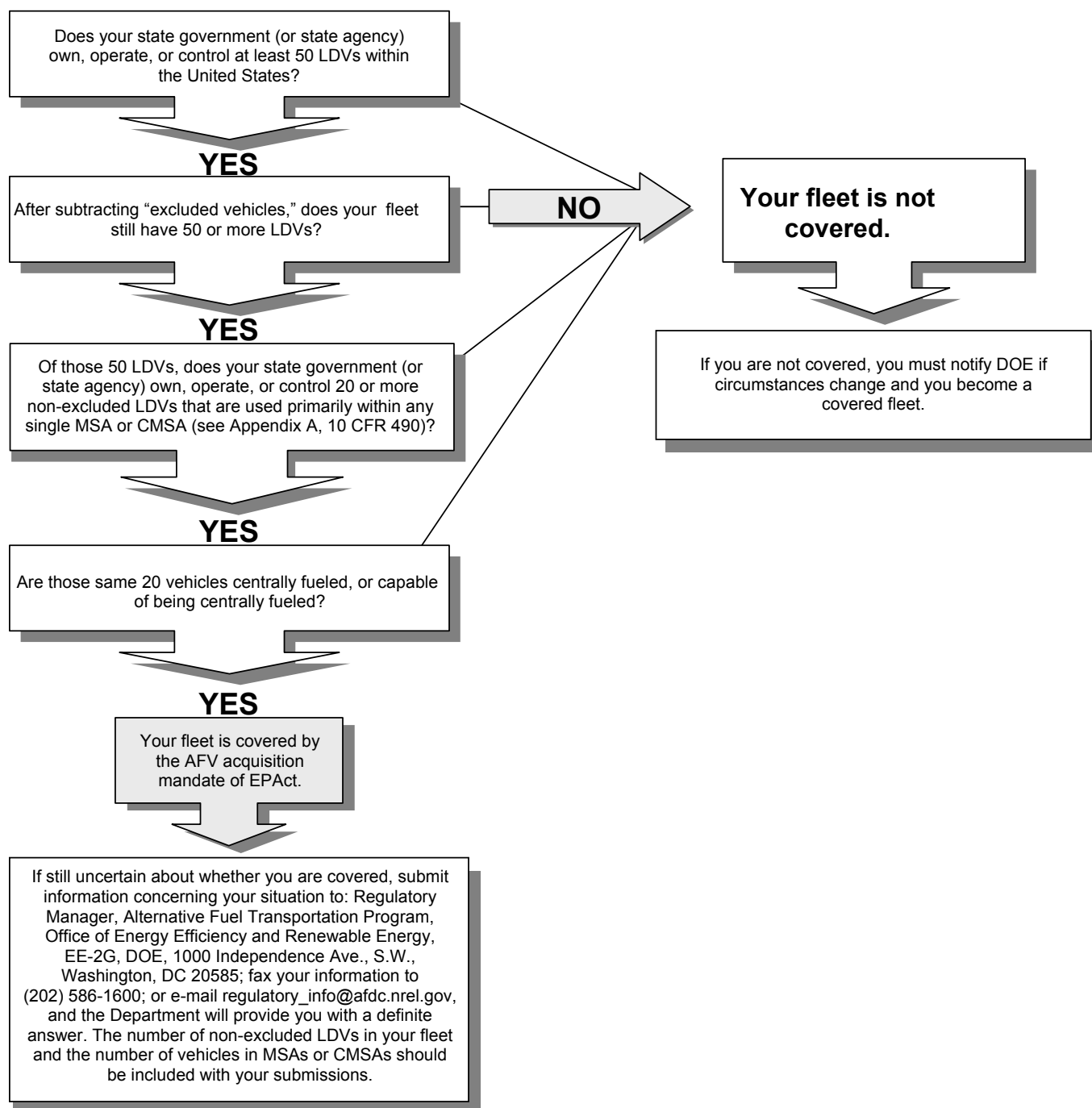
- Exemptions (10 CFR 490.204): State fleets in some cases may apply for and receive partial or full "exemption" from having to acquire AFVs. Fleets that purchase vehicles that are not available in an alternative fuel option or that do not have access to alternative fuel outlets or retailers may apply for and receive exemptions. Under DOE's regulations, fleets must request and receive exemptions from DOE *each year*, since the availability of AFVs and refueling changes. Under no circumstances should fleets be self-exempting vehicles. Fleets that receive exemptions also must submit an annual report and vehicles that qualify for exemptions must be included in the fleets report as covered LDVs. If exemptions are granted, DOE will modify the fleets report to account for them. Detailed guidance describing the process for filing exemptions is located on the EPAct Web site (under "Guidance Documents" -- http://www.eere.energy.gov/vehiclesandfuels/epact/state/state_resources.shtml). This guidance spells out the process used by DOE to consider exemptions and also the obligation to consider all available alternative fuel options, including maximizing the use of biodiesel blends, before submitting an exemption request.

KEY DOCUMENTS TO REVIEW

- A Guidebook to the U.S. DOE's Alternative Fuel Transportation Program for State and Alternative Fuel Provider Fleets
- S&FP Program: Frequently Asked Questions
- Annual AFV Reporting for State and Alternative Fuel Provider Fleets
- Submitting an Annual Report over the Internet
- Alternative Fuel Transportation Program Final Rule, 61 Fed. Reg. 10622 (March 14, 1996)
- Biodiesel Fuel Use Credit Interim Rule, 64 Fed. Reg. 27169 (May 19, 1999)
- Biodiesel Fuel Use Credit Final Rule, 66 Fed. Reg. 2207 (Jan. 11, 2001)

All of the above documents and additional information to help fleets determine their covered status and how to comply with EPAct and DOE requirements are located on the EPAct Web site at: <http://www.eere.energy.gov/vehiclesandfuels/epact/state/index.shtml>.

FIGURE 1. DECISION TREE FOR STATE GOVERNMENT FLEETS



OBJECTIVES OF A STATE SELF-AUDIT

A state conducting a self-audit of its fleet should evaluate whether (1) state guidance to fleets is accurate and complete; (2) state fleet administrators are aware of the S&FP Program regulations (10 CFR Part 490); (3) all fleets that meet the criteria for coverage are participating and complying with the S&FP Program regulations; (4) fleets are accurately determining their AFV acquisition requirements; and (5) the state government entity or entities in charge of collecting and assessing vehicle acquisition data and reporting it to DOE are doing so properly.

STEP-BY-STEP PROCEDURES FOR AN AUDIT

The following steps are included in the self-audit process:

1. Select the authority that will conduct the audit
2. Identify contact information for state fleets
3. Review state guidance materials and information provided to state fleets to determine whether they are accurate and complete (DOE can help with this)
4. Review state reporting procedures and forms to determine if they collect appropriate and accurate information
5. Survey individual fleets to determine whether they understand the S&FP Program's requirements and assess whether potential compliance problems exist
6. Audit the records of fleets that appear to be problematic and/or randomly audit selected agencies
7. Review any problems that are discovered and recommend solutions to ensure that they do not recur.

Steps 1–5 are designed to review specific programs and steps the state has put into place to ensure they are consistent with DOE's regulations. Step 6 involves actually auditing fleets to ensure that they accurately determine their obligations under EPCa, are satisfying their acquisition requirements, and are properly reporting.

STEP 1 – SELECT AN AUDITOR

The state should identify an appropriate governmental entity or entities that will coordinate the state fleet audit. The state entity conducting the audit should be familiar with the regulatory requirements of EPCa and also have a detailed understanding of state fleet programs. If the state has an entity that regularly audits state government entities and agencies to determine compliance with state or federal regulations, that entity may be the appropriate one to conduct the audit. It also may be appropriate, however, to have the state entity that handles energy or transportation conduct the audit.

STEP 2 – IDENTIFY STATE AGENCY CONTACTS

Regardless of which state government entity conducts the audit, the next step should be to compile a list of state entities and agencies, including the names and contact information of fleet administrators. In a state that does not file a single annual report with DOE, the review of individual state fleets may be limited to fleets that own or operate 50 or more LDVs. While state government entities or agencies with fewer vehicles than this do not need to be surveyed or

audited, it is recommended that the state survey and audit fleets that are close to 50 vehicles (e.g., 40–49 vehicles) to verify the actual number of vehicles in their fleets and to determine if future expansion plans could result in coverage. Other criteria can be used to further limit the scope to fleets that are covered by EAct, but it is suggested that the state survey all government fleet entities that own or operate 50 or more LDVs.

It is also necessary to identify and contact the various entities or agencies responsible for procuring state vehicles, providing instructions to fleets on how to comply with EAct, and collecting data from the fleets to assess and report EAct compliance to DOE. The auditors should schedule meetings with the officials responsible for these functions to identify materials that have been used and to learn what information is available on state purchasing practices. Notes should be taken during these meetings to ensure an accurate record of what was covered.

STEP 3 – REVIEW STATE GUIDANCE MATERIALS

State officials conducting an audit should review all state materials that relate to the S&FP Program, including letters, guidance documents, and other materials that have been prepared by the state and sent to fleets. It is possible that the State Energy Office, General Services Administration, State Department of Transportation, and, in some cases, the entity or agency charged with overseeing environmental issues have distributed EAct related information to state government fleets. This information should be reviewed to determine its accuracy and completeness. They should also be reviewed to determine whether the materials provided to state fleets are consistent with guidance documents prepared by DOE, if there are any errors or omissions in the information presented, and whether instructions are clear and unequivocal. If necessary, DOE will help state authorities review and evaluate this information. In collecting the information, auditors should attempt to learn how the information is distributed and to whom.

STEP 4 – REVIEW STATE REPORTING PROCEDURES AND FORMS

The entity conducting the audit should review the process used for collecting, analyzing, and reporting fleet data. If the state uses DOE’s FCVT/101/Form to collect information, there is no need to review the form or the instructions. If the state uses its own forms to collect information, make sure to review the forms to ensure they are designed to make it easy to enter data accurately. The forms should also be checked to determine whether the entity or agency in charge of collecting information checked the vehicle identification numbers of reported vehicles, whether the calculations used to determine AFV acquisition requirements are correct, and whether quality control measures are implemented before the data is forwarded to DOE. The fourth step generally applies only to states that file a single annual report. In cases where individual fleets file reports with DOE, it is expected that they will follow DOE’s instructions for reporting and will use DOE’s reporting form.

STEP 5 – SURVEY FLEET ADMINISTRATORS

Survey fleet managers to determine if they understand the EAct requirements and to identify fleets that may be out of compliance with the S&FP Program’s requirements. The survey also should help state authorities determine whether their efforts to educate fleets on the program’s requirements are working (see Figure 2 for an example of a survey for fleet administrators). The survey below is designed to address the coverage and compliance of individual fleets in states that do not file a single or consolidated report. If the state files a single report, DOE suggests the

agency or entity responsible for collecting data and reporting use the checklist in the attachment to this document to ensure proper reporting and compliance. The attachments also include a survey form for states that file a single or consolidated report. The survey in the attachment is a slightly different version of the survey below. States that file single or consolidated reports are reminded to ensure that they collect and report information on all agencies or entities that own or operate light duty vehicles that are used in the covered Metropolitan Statistical Areas or Consolidated MSAs. In the case of single filer states, all state owned or operated vehicles used in a covered MSA or CMSA are considered part of the same fleet for purposes of reporting and compliance. In addition, state-wide reports or consolidated reports should collect and report information on all newly acquired covered vehicles not simply information on vehicles leased or acquired by the state for individual fleets.

FIGURE 2. SURVEY QUESTIONS FOR FLEET ADMINISTRATORS

1. Did you know the Energy Policy Act of 1992 requires certain state government fleets to acquire alternative fuel vehicles (AFVs) when they acquire light duty vehicles (LDVs)?
 - a. Yes ☐
 - b. No ☐
2. The AFV purchase requirements for state government fleets are set out in the Alternative Fuel Transportation Program, 10 CFR Part 490. Have you received any materials, including guidance, letters, or reports, discussing this Program and how it works?
 - a. If so, please describe:
 - i.
 - ii.
 - iii.
3. Does your state government entity or agency own or operate 50 or more LDVs (8,500 GVWR or less)? *Do not count nonroad vehicles, emergency or law enforcement vehicles, vehicles that are garaged or parked at personal residences when not in use, and vehicles that are acquired solely for research or testing purposes.*
 - a. Yes ☐
 - b. No ☐
4. If your entity or agency owns 50 or more LDVs, are 20 or more of these vehicles used primarily in one of the state's covered metropolitan statistical areas (MSA) or consolidated MSAs⁶?
 - a. Yes ☐
 - b. No ☐
5. If 20 or more LDVs are located in a single MSA or CMSA, are these vehicles centrally fueled or capable of being central fueling? "Capable of central fueling" means that 75% or more of the vehicle's annual miles are derived from trips that are less than the operational range of the vehicle. Most vehicles (except those that travel on very long trips and only infrequently return to a central location) are considered to be capable of central fueling under the existing definition.
 - a. Yes ☐
 - b. No ☐

⁶ The survey form should include a list of covered areas. This information is available on DOE EPA website http://www.eere.energy.gov/vehiclesandfuels/epact/state/progs/dyn_msa.cgi.

6. Are any of the fleets under your control currently submitting an annual AFV acquisition report to DOE's S&FP Program or to a state agency for the purpose of it submitting the information to DOE?
- Yes _____
 - No _____

ANSWER QUESTIONS 7–9 IF THE ANSWER TO QUESTION 6 IS “YES”

7. When reporting covered LDV acquisitions, do you include all newly acquired vehicles or only those for which AFVs or alternative fuel supplies are available?
- Report all covered LDVs _____
 - Report only LDVs for which AFVs or alternative fuel are available _____
8. Has your fleet ever received a notice that it was out of compliance?
- Yes _____ *If yes, what was the reason(s) for noncompliance*
 - _____
 - _____
 - _____
 - No _____
9. Please describe any back-up or supporting records or data that your fleet maintains to substantiate information that has been submitted to DOE or the state.
- _____
 - _____
 - _____

STEP 6 – AUDIT PROBLEMATIC FLEETS AND RANDOMLY AUDIT OTHER FLEETS

Examine the responses to the survey questionnaire, and determine which fleets require additional attention. Fleets that are unaware of the Program's requirements or appear to be “covered” but are currently not reporting to DOE should be audited. In addition, fleets that have received a noncompliance notice from DOE should be audited. DOE recommends that at least six different state entities should be selected for audit. This may include a combination of fleets that performed poorly on the survey and a few random selections. When analyzing fleet data, review data for the past three consecutive and completed model years.

Approach the appropriate official at each of the six government entities (in person or by telephone, depending on the circumstance) to examine the fleet's vehicle-purchasing documents and inventory records. Be sure to address the following questions:

- Is the auditor thoroughly familiar with the fleet's reported data before making contact?
- Does the number of AFVs reported by the fleet agree with the actual purchasing data?
- Does the number of LDVs reported accurately represent all covered LDVs?
 - Has the fleet incorrectly excluded some vehicles that are covered?
 - Has the fleet self-exempted any vehicles due to a lack of AFV or alternative fuel availability?

- Has the fleet accounted for all LDVs that are primarily operated in covered MSAs or CMSAs?

Determine why there is any discrepancy between reported data and actual motor vehicle purchasing and inventory data. Address the following questions:

- Was there a misunderstanding by the fleet of the types of data required?
- Was a vehicle incorrectly reported as an AFV?
- Were the numbers entered into the proper place on the reporting form?
- Were the purchases of AFVs reported for the correct year?
- Were some covered LDVs improperly excluded?
- Were some vehicles exempted without requesting an exemption from DOE?

Discuss the audit findings openly with the coordinating state entity or agency to gain further insight into problem areas and receive their recommendations for procedural changes. Address the following questions:

- Is there a lack of communication between the fleet and the S&FP Program?
- Is better guidance on EPC requirements needed from the program?
- Should the state entity or agency improve its annual instructions to fleets regarding EPC compliance?
- Would fleet managers and operators benefit by additional training on how to determine “covered” status, fleet compliance, etc.?

Prepare a short report to summarize the results of the audit. Address the following questions:

- Have the auditors included the pertinent data in the report to verify any areas of noncompliance?
- What conclusions can be drawn from the audit regarding reasons for the discrepancies found?

STEP 7 - DEVELOP A PLAN TO ADDRESS COMPLIANCE PROBLEMS

The auditors should work with the fleets to develop a strategy that resolves past compliance problems and avoids future compliance problems. The auditors should also correct any problems disclosed as a result of reviewing guidance and reporting materials used by state fleets.

FURTHER STEPS

Discuss results of the state program audit, survey, and individual fleet audits with officials from DOE’s S&FP Program. Identify ways DOE can provide better guidance or work with state officials to better educate fleet managers.

ATTACHMENT A

Checklist for State Audits

Steps	Description	Checklist	Date of Completion	Notes
1	Select an agency or governmental unit that will conduct the audit			
2	Identify State Agency and Entity Contacts (including State universities and colleges) Identify individual fleet contacts - fleet managers or department heads Identify contacts at state entity responsible for acquiring vehicles Compare list of fleets with DOE list of state fleets to determine non-reporting entities			
3	Review materials Determine if guidance documents developed by state for individual fleets are accurate Determine if guidance documents developed by individual fleets are accurate Seek DOE assistance in reviewing these documents for accuracy			
4	Review State reporting procedures and forms Determine if fleets are using DOE reporting form or a state form If state has its own forms, review the forms to ensure that all relevant information is collected Determine if fleets are properly calculating requirements (e.g., not self-exempting vehicles, only excluding allowed vehicles) Determine if procedures are used to verify the quality and accuracy of data			
5	Survey State fleet managers* Send questionnaire to fleets identified in Step 1			
6	Review results of survey Determine fleets that need additional review, including: Fleets that are unfamiliar with program Fleets that have large number of vehicles but are not currently reporting to DOE Fleets that indicate unusually small number of vehicles for their size and mission Fleets that have past Program violations and/or deficiencies			
7	Audit fleets identified in Step 6 Visit fleets to review inventory records Compare inventory records with reports submitted to DOE (if fleet is reporting) Determine if there are compliance problems (e.g., excluding covered vehicles, failure to report to DOE, self-exempting vehicles) Debrief with fleet manager(s) to determine why problems exist Summarize results of audit Develop plan to address problem areas			

** If state agencies and entities file individual reports, this survey can be limited to agencies or entities that have 50 or more light-duty vehicles. If the state files a single report or a partially consolidated report, all agencies with any light-duty vehicles operating in any of the covered MSA/CMSs should be surveyed.*

ATTACHMENT B

Checklist for Single or Consolidated State Report Filers

Steps	Description	Check List	Date of Completion	Notes
1	Send out notice in August reminding fleets of reporting obligation			
2	Collect data on all newly acquired light duty vehicles (LDVs = or less than 8,500 lbs. GVWR)			
3	Collect information documenting the reasons any newly acquired light duty vehicles that are excluded			
4	Collect alternative fuel use data if State fleets intend to sell credits to fuel provider fleets			
5	Collect required information on all AFV acquisitions (VIN numbers, model type, zip code location, etc.)			
6*	Be sure to include newly acquired vehicles, including vehicles leased for more than 4 months			
7	Notify DOE if there are any agencies/entities that you know are covered but are not included in state report			
8	Collect data on biodiesel purchased for use (fleets should only report the non-petroleum portion of biodiesel)			
9	If exemptions are necessary, send in request as early as possible before close of reporting period, Dec. 31			
10	Contact the Regulatory Information Line (202) 586-9171 with any compliance questions			
11	Contact Titan if you have any reporting problems or questions (800) 959-5780			
12	Submit timely report to DOE (before 12/31)			
13	Periodically assess status of agency or entity fleets to ensure all covered fleets are reporting			
14	Consider conducting periodic audits of fleets to ensure data quality and compliance			

**Notify DOE if the report does not include vehicles acquired or leased outside of the state procurement process. For example, if the State Department of General Services files a consolidated report, it should include all vehicles acquired by covered fleets, even vehicles not purchased or leased through it.*

ATTACHMENT C

Survey Questions For Fleet Administrators (For States that File a Single or Consolidated Report)

1. Did you know the Energy Policy Act of 1992 requires certain state government fleets to acquire alternative fuel vehicles (AFVs) when they acquire light duty vehicles (LDVs)?
 - a. Yes _____
 - b. No _____
2. The AFV purchase requirements for state government fleets are set out in the Alternative Fuel Transportation Program, 10 CFR Part 490. Have you received any materials, including guidance, letters, or reports, discussing this Program and how it works?
 - a. If so, please describe:
 - i. _____
 - ii. _____
 - iii. _____
3. Does your state government entity or agency operate any light duty vehicles (8,500 GVWR or less) in any of the state's covered metropolitan statistical areas (MSA) or consolidated MSAs⁷? *Do not count nonroad vehicles, emergency or law enforcement vehicles, vehicles that are garaged or parked at personal residences when not in use, and vehicles that are acquired solely for research or testing purposes.*
 - a. Yes _____
 - b. No _____
4. Are your fleet vehicles that are operated in any of the covered MSAs or CMSAs centrally fueled or capable of being central fueling? "Capable of central fueling" means that 75% or more of the vehicle's annual miles are derived from trips that are less than the operational range of the vehicle. Most vehicles (except those that travel on very long trips and only infrequently return to a central location) are considered to be capable of central fueling under the existing definition?
 - a. Yes _____
 - b. No _____
5. Are the light duty vehicles operated by your fleet and identified above included as part of the state's annual acquisition report to DOE's S&FP Program or to a state agency for the purpose of it submitting the information to DOE?
 - a. Yes _____
 - b. No _____

ANSWER QUESTIONS 6 - 7 IF THE ANSWER TO QUESTION 5 IS "YES"

6. When reporting covered LDV acquisitions, do you include all newly acquired vehicles or only those for which AFVs or alternative fuel supplies are available?
 - a. Report all covered LDVs _____
 - b. Report only LDVs for which AFVs or alternative fuel are available _____
7. Please describe any back-up or supporting records or data that your fleet maintains to substantiate information that has been submitted to DOE or the state.
 - a. _____
 - b. _____
 - c. _____

⁷ The survey form should include a list of covered areas. This information is available on DOE EPA website http://www.eere.energy.gov/vehiclesandfuels/epact/state/progs/dyn_msa.cgi.